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ASARCO

September 15, 2006

Mr. Kevin L. Rochlin
Remedial Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, ECL-111
Seattle, WA 98101

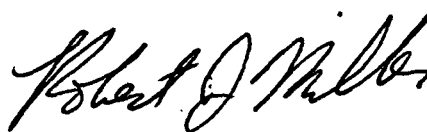
RE: Monthly Reports: No. 123, August 2006
Operable Unit No. 02
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Asarco is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. The report is organized to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,



Robert Miller
Tacoma Projects Manager

Attachment (4 copies)

cc: Chung Ki Yee - Washington Department of Ecology
Glen Vadera - CH2MHill (2 copies)
Richard Kauffman - ATSDR c/o U.S. EPA Region 10
Leslie Ann Rose - Citizens for a Healthy Bay

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A. Actions taken to achieve compliance with the Consent Decree during the previous month.

1. A regular monthly design review meeting was not held in August.
2. Remedial Design continued. Remaining design elements are incorporated into the Tacoma Upland Remediation Design – Grade and Cap Site and Breakwater Peninsula.
3. Remedial Action activities continued.

B. Summary of sampling, tests, and all other data received or generated by Asarco in the previous month.

1. Outfall activities including the following:

Section 2.6.1 of the Statement of Work (SOW) requires Asarco to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm. EPA and Asarco met on April 17, 2003 to discuss monitoring at the Tacoma Smelter site. The following changes to the outfall monitoring program were agreed to on an interim bases:

Sampling at the Middle Outfall was discontinued. Flows to this outfall have been re-routed to the North Outfall. Remaining seepage out of the Middle Outfall is too low to measure and does not provide accurate water quality results. Sampling at the North and South outfalls will continue through RA. Weekly composite samples (instead of daily composite samples) will be collected at each of these outfalls during the construction season. During the winter season, outfall samples will be collected every other month. The following schedule began in May of 2003. Weekly composite samples will be collected during the following months: May-October, December, February, and April. Results for samples collected in July are attached. As agreed in May 2006, flow data is no longer collected.

2. OCF leachate is currently collected in a Baker tank for offsite disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OMMP. LCRS volumes during July/August averaged 215 gallons per day on the LCRS. This rate indicates a steady decline from 411 gallons per day at the end of July 2005 when the cover system was installed.

Leachate collected in the Baker tank was sampled in July and had 4.9 mg/Kg As. Approximately 13,800 gallons of leachate were shipped for offsite disposal on July 19th, 21st, and 24th.

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B. Work Plans and other deliverables completed and submitted during the previous month.

1. No new comments were received from EPA during the month of August.
2. The Final Construction Report – *Tacoma Smelter Shoreline Remedial Action Construction Project (2000 and 2001 Activities)* was submitted to EPA on August 28, 2006.
3. Final Smelter site remediation design continued in August.
4. Remedial Action during August included the following tasks:
 - OCF construction activities:
 - Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary Baker storage tank.
 - OCF cover soil preparation for seeding began.
 - Source Area construction activities:
 - Maintained erosion and surface water controls
 - Site Capping construction activities:
 - Maintained subgrade areas at the site
 - Site-wide remediation activities:
 - Continued surface water controls
 - Maintained haul roads and stockpiles onsite
 - Water Treatment System:
 - Continued to collect water in baker tank for offsite disposal

D. Actions scheduled for the next six weeks.

1. Final Remedial Design will be submitted to EPA in September.
2. Asarco expects to receive comments from EPA on the following submittals:
 - None expected.
3. The following Remedial Action tasks are planned to continue:
 - RA Monitoring:
 - Outfall sampling (weekly composite samples) during scheduled months
 - OCF construction activities:
 - Continue collection of leachate in baker tank for offsite disposal
 - Continue monitoring of leachate volumes
 - Continue to inspect lower vault for leaks
 - Source Area construction activities:
 - Erosion controls and site maintenance
 - Additional excavation of materials from Stack Hill to extend remediated area for development
 - Site Capping construction activities:
 - Continue to maintain subgrade areas at the site
 - Site-wide construction activities:
 - Continue surface water controls

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➤ Maintain roads and stockpiles onsite

E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.

1. Group 1 Preliminary Design tasks are 100% complete; Intermediate Design is 100% complete; Final Design is about 99% complete.
2. Group 2 Preliminary Design is about 100% complete; Intermediate Design is essentially complete, Final Design is about 99% complete.
3. Surface water evaluation is complete.

F. Modifications to work plans or schedules proposed to or approved by EPA.

1. Schedule revisions may be necessary because the RD schedule in the Remedial Design Reports (RDRs) anticipated Consent Decree lodging in April 1996. The current RD Schedule (Final Revision 1) was prepared in September 1996 and is part of the RD Work Plan.
2. Asarco is currently working per Revision 8 of the RD schedule as discussed with EPA during the May 23, 2000 RD meeting.
3. The Second Amendment to the Consent Decree is out for public comment. The amendment is the settlement agreement negotiated between EPA, DOJ and Point Ruston for the remaining cleanup work at the Smelter site that Point Ruston will be responsible for as the purchaser of the Asarco Tacoma site.

G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.

1. Meetings held in August:
 - Asarco attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA activities (1st and 3rd Monday of each month).

Table 1. Summary of July 2006 Outfall Data for As, Cu, and Zn Compared to SOW Limit

Location	As Conc. ppm	% of SOW Limit*	Cu Conc. ppm	% of SOW Limit*	Zn Conc. ppm	% of SOW Limit*
South Outfall	0.064	12.84%	0.020	4.00%	0.014	2.80%
North Outfall	0.051	0.00%	0.038	7.60%	0.035	7.00%

* 0.5 ppm is the limit of As, Cu, and Zn allowed as documented in the SOW.